

2189850



cpatter@rmi.net on 09/25/2000 11:53:10 AM

To: Bonita Lavelle/EPR/R8/USEPA/US

cc:

Subject Re: VB/170 technical meeting

:

---

Dear Bonnie,

I wish you could have attended the TAG workshop in Nashville. It was extremely interesting to hear about all the different sites and how each TAG recipient group handled their unique problems. One interesting thing that came out of the 30-odd groups there: all said that the ATSDR presence had been a rather painful nuisance, promising much, delivering little. the rep from ATSDR literally had to leave the room. They weren't much kinder to the EPA guy from D.C., who also left.

#### Comments on RA

I recognize that the time period for comments on the RA is over, but I had some pretty strong thoughts about it the last few days and would be happy if you could include them and share with the group.

I have come to the personal conclusion that the only fair and ethical cleanup level for these yards is to the regional background level. This is no more than putting it back like it was. The concept of cleaning to the 10-4 risk level seems to be a cynical game of statistics with people's lives. The element of fairness is lost otherwise, and people might rightly feel they are being subjected more to the accountant's pencil than to a legitimate concern for their health and welfare. I have also come to feel that toxicology as a science is a bit too shakey theoretically to base these decisions on the long chain of reasoning they use. Cleaning to background is straightforward, and clearly the ethical choice. Since Globe was cleaned up to that level, there is a precedent, as well a public perception of equity. The regional background is 22-28 ppm As, which is still about a 10-5 risk, depending on how you calculate bioavailability. I recognize this is against the flow, but this whole process has finally crystallized my thoughts, and I am comfortable with my decision. Please include my comments if possible.

Best Regards,

Chuck Patterson, Ph.D.

TAG Advisor-Globe/ASARCO site